

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION,

Plaintiff,

v.

SICHUAN CHANGHONG ELECTRIC
COMPANY, LTD.,

Defendant.

CASE NO. C13-02245-JCC

JOINT STIPULATED MOTION AND
[PROPOSED] ORDER REQUESTING
EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO
COMPLAINT BY 30 DAYS PURSUANT
TO LCR 7(d)(1)

**NOTE ON MOTION CALENDAR:
February 21, 2014**

STIPULATION

Pursuant to Local Civil Rule 7(d)(1), Plaintiff Microsoft Corporation (“Microsoft”) and
Specially Appearing Defendant Sichuan Changhong Electric Company, Ltd. (“Changhong”), by
and through their undersigned counsel, stipulate as follows:

WHEREAS, Microsoft initiated this action on December 17, 2013;

WHEREAS, Changhong agreed to waive service of a summons and the complaint in this
action;

WHEREAS, Changhong’s current deadline to respond to the Complaint is March 5, 2014;

WHEREAS, the parties are currently involved in settlement negotiations in an attempt to
settle this matter in its early stages;

WHEREAS, in light of the fact that the parties are currently engaged in on-going settlement negotiations, the parties have agreed that the deadline for Changhong to respond to the Complaint may be extended by thirty (30) days, to and including April 4, 2014;

WHEREAS, no previous extension of time has been requested;

WHEREAS, by filing this stipulated motion to extend time to respond to the Complaint, Changhong does not make a general appearance or waive any jurisdictional defenses or objections, including but not limited to defenses or objections for lack of personal jurisdiction or improper venue. *See Benny v. Pipes*, 799 F.2d 489, 493 (9th Cir. 1986) (filing motion to extend time to respond to complaint did not constitute general appearance or waiver of jurisdictional objections);

DATED this 21st day of February, 2014.

K&L GATES LLP
Attorneys for Plaintiff Microsoft Corporation

SUMMIT LAW GROUP PLLC
Attorneys for Specially Appearing Defendant
Sichuan Changhong Electric Company, Ltd.

By /s/ David L. Bateman
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By /s/ Philip S. McCune
By /s/ Denise L. Ashbaugh
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ORDER

Based on the above Stipulation of the parties, IT IS HEREBY ORDERED that Changhong's deadline to respond to the Complaint shall be extended by thirty (30) days, to and including April 4, 2014.

IT IS SO ORDERED

DATED this ____ day of _____, 2014.

THE HONORABLE JOHN C. COUGHENOUR
UNITED STATES DISTRICT JUDGE

Presented by:

K&L GATES LLP
Attorneys for Plaintiff Microsoft Corporation

SUMMIT LAW GROUP PLLC
Attorneys for Specially Appearing Defendant
Sichuan Changhong Electric Company, Ltd.

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